EUROPEAN SEX WORKERS' RIGHTS ALLIANCE APRIL 2025

Sex Workers Belong On Social Media:

Recommendations for Platform Accountability

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Introduction

This report is part of the European Sex Workers' Rights Alliance (ESWA) Digital Rights programme, expanding on previous work to address the discrimination, surveillance, and censorship sex workers encounter in digital spaces, particularly on social media platforms. Building on our report, The Impact of Online Censorship and Digital Discrimination on Sex Workers (2022a), which documented these issues through extensive community consultations, this report shifts from identifying problems to proposing solutions. It sets out strategies for improving social media platform accountability and ensuring more inclusive, equitable platform policies. This includes how we can address the intensifying online discrimination against sex workers on social media platforms, what actions will foster more inclusive and equitable platform policies, and whose responsibility it is to ensure these measures are implemented.

The challenges outlined here are part of wider debates on platform governance, affecting many communities striving for fair representation, freedom of expression, and digital rights. While this report focuses on the needs of sex workers, its recommendations have broader relevance for other groups disproportionately affected by restrictive content moderation policies. This includes LGBTQIA+ communities, users from racialised and Indigenous groups, human rights advocates, and individuals raising awareness in conflict zones.

This report presents targeted recommendations for those responsible for ensuring platform accountability for sex workers, including community organisations, civil society groups, government regulators, policymakers, and social media platforms. It focuses on the largest mainstream social media platforms used in Europe and Central Asia, particularly those owned by Meta and X. Under the newly enforced EU Digital Services Act (DSA) (2022), these platforms are now classified as Very Large Online Platforms (VLOPs) and are required to implement safeguards against discrimination or face penalties.[1]

The report begins with a literature review, establishing the foundation for the solution-driven approaches explored in the main sections. Drawing on consultations with sex workers in Europe and Central Asia, alongside insights from researchers and specialists, it critically examines potential solutions for increasing platform accountability.

[1] The EU Digital Services Act's definition of VLOPs https://digital-strategy.ec.europa.eu/en/policies/dsa-vlops

Literature Review

1. DISCRIMINATION AGAINST SEX WORKERS ON SOCIAL MEDIA PLATFORMS

In recent years, sex worker-led organisations have documented the discrimination that both sex workers and sex worker rights advocacy groups face on social media platforms *(ESWA 2022a, 2022b, 2023a; Hacking//Hustling 2020a, 2020b)*. Shared experiences of discrimination include practices such as shadow banning, [2] deplatforming, [2] and full or partial account suspension - often without any avenue for appeal. All these practices fall under the umbrella of content moderation, where social media platforms wield significant control over the spaces they host *(York, 2021; Gorwa, 2020)*.

Research on social media content moderation has examined both covert and overt censorship practices *(Are, 2021; Gillespie, 2018; Tiidenberg and van der Nagel, 2020)*. However, the lack of transparency from social media companies makes it difficult to track and challenge these practices. The methods used to censor sex workers in 2020 differ significantly from the present landscape in 2025. Today, terms like "shadow banning" encompass a broad range of covert censorship actions. These include removing content from recommendation feeds, reducing visibility, and hashtag blocking *(Divon, Are and Briggs, 2025; Gilespie in Blunt et al., 2021; Tiidenberg, 2021)*. These practices have far-reaching implications for sex workers' ability to engage with their audience and advocate for their rights.

In order to frame the proposed accountability measures laid out in this report, we must outline the four key functions that social media serve for sex workers, and the impact of losing access to these functions:

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[2] a "shadow-ban" is a user-generated term for one of Instagram's opaque content moderation strategies. When a user is "shadow-banned" Instagram dramatically reduces posts' or account visibility by hiding them from its Explore page without warning and often without specific justification (John Constine 2019 cited in Are, 2021, p. 2002).

[3] "Deplatforming is a form of structural violence that predominantly impacts populations already vulnerable to policing". Due to stigma against sex work "sex workers disproportionately lose access to social media platforms, bank accounts, and financial technologies". Social media platforms and payment providers consider engagement with the content of sex workers as either too "high-risk" or not profitable (Blunt and Stardust, 2021, p. 359).

1.1 Social Connectivity and Community Building

Social media serves as a vital lifeline for sex workers, connecting them with peers, events, and clients. This is especially important in regions where they face criminalisation and are forced to work alone *(Hardy and Barbagallo, 2021; ESWA 2022a)*. However, the fear of being removed from platforms or facing legal action discourages sex workers from engaging online. This leads to "social chilling", where people withdraw from digital spaces to avoid potential risks, resulting in social isolation *(Are, 2021; Gillespie, 2018)*.

1.2 Financial Empowerment and Stability

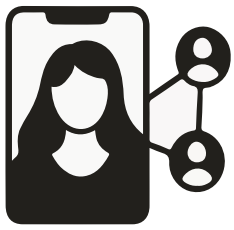
Social media increases economic empowerment and financial stability for sex workers, driving traffic to their services *(ESWA, 2022a)*. Evidence from research and real-world data has shown that the removal of safe and low-cost places to advertise has pushed workers into economic insecurity. This impact is especially severe for trans, non-binary, Black, Indigenous and people of colour (BiPoC), disabled people and working-class sex workers *(Jones, 2022, p. 85)*. Deplatforming and covert data-sharing between social and financial platforms also exacerbates this. When sex workers are removed from platforms or their data is shared without their knowledge, they risk being flagged by banks and online payment providers. This creates fear of financial discrimination, such as having their accounts frozen or transactions blocked, which discourages them from engaging online *(Beebe, 2022; Guardian, 2021; Hardy and Barbagallo, 2021)*.

1.3 Health and Safety

Social media enables sex workers to share vital health and safety resources, from information on accessing free safer sex supplies to reviews of problematic clients or workplaces. As legal ways for working online disappear, so too does access to these vital resources. This also includes resources provided by sex worker organisations, which offer services such as legal advice, social support and housing assistance *(ESWA, 2022a; NSWP, 2018)*.

1.4 Activism and Community Resources

Political organising often takes place on social media platforms. This is especially important when the issue affects an international community. Discriminatory content moderation disproportionately restricts sex workers ability to organise *(Divon, Are and Briggs, 2025)*. Algorithmic decision-making systems often ban or limit the accounts of sex worker rights organisations *(ESWA, 2022a; Hacking//Hustling, 2020a)*.



Social Connectivity and Community Building

Financial Empowerment and Stability

Health and Safety

Activism and Community Resources

2. UNRAVELLING THE ORIGINS OF ONLINE DISCRIMINATION: STIGMA, CRIMINALISATION AND BIG TECH

Community reports have shown the discrimination sex workers face, prompting academic and community research into the origins of these discriminatory content moderation practices. This section explores three key factors driving these practices: social stigma, the criminalisation of sex work, and the role of Big Tech.

WHAT DOES A SEX WORKER INCLUSIVE CONTENT MODERATION STRATEGY LOOKS LIKE?
WHAT ELSE IS NEEDED TO ENHANCE ACCOUNTABILITY FOR THE SEX WORK COMMUNITTY?
WHO CAN ENSURE PLATFORM MEET THEIR RESPONSABILITIES?

2.1 Stigma, Sex-negativity and Society

Since most major social media platforms are governed by American legal and social structures where sex work is criminalised and stigmatised, calls for decriminalisation and destigmatisation are essential for ensuring the safety and rights of sex workers internationally. Discriminatory content moderation policies are "guided by socio-cultural norms that stigmatise sex" *(ESWA, 2022a; Beebe, 2022)*. Social media platforms like X and Instagram are influenced by American conservative, Christian, and imperial concepts of sex and relationships, while ByteDance for example *(Douyin and TikTok)* is informed by respective conservative Chinese values and norms *(Barwulor et al., 2021; Tiidenberg, 2021)*. This means any content diverging from traditional notions of sex, gender and sexuality is disproportionately impacted, affecting sex workers as social media users and content creators *(Tiindenberg and van der Nagel, 2020; ESWA, 2022a, York, 2021, p. 157)*.

Stigma influences how platforms engage with sex worker content, often prioritising risk management over freedom of speech *(Swords et al., 2021)*. Who has access to mainstream social media is a matter of equity, particularly for groups that are socially excluded from society. However, the stigma against sex work means sex workers are typically excluded from conversations about freedom of speech and the consideration of protected characteristics *(York, 2021; ESWA 2022a; Hacking//Hustling 2022a, 2022b)*. This stigma also contributes to platforms' lack of transparency in their decision-making processes. Dr. Zahra Stardust writes that platform providers wield immense power as gatekeepers of public discourse, "yet they lack the mechanisms for transparency and review required of governments" *(2018, p.12)*. The global trend toward "corporate arbitration of community standards" has significant consequences *(2018, p. 12)*. Control over marginalised communities is no longer limited to governments; major corporations like Meta and Mastercard now hold this power, without external regulation *(Swords et al., 2021; Beebe, 2022)*.

2.2 Legal Infrastructure: Criminalisation of sex work, FOSTA/SESTA and Platform Governance

Understanding the legal constraints faced by online platforms is crucial for improving accountability. The FOSTA/SESTA laws in the US impact nearly all mainstream accountability processes for sex workers, as most major platforms are hosted in the US *(ESWA, 2020a; Beebe, 2022; Jones; 2022)*. In 2018, the FOSTA *(H.R. 1865)* and SESTA *(S.B. 1693)* laws changed Section 230 of the Communications Decency Act, essentially making online platforms legally responsible for the content their users post. Although these laws were presented as anti-trafficking measures, Jones explains that they introduced a new criminal offence: "promotion or facilitation of prostitution and reckless disregard of sex trafficking" (Jones, 2022, p.74). This means that anyone who owns, manages, or operates an online platform could face fines or up to 10 years in prison if their site is seen as enabling prostitution, even if no trafficking is involved. These laws were broad and sweeping, leading to a mass 'over-response' from platforms who removed anything that could potentially lead to damaging and expensive legal battles *(Tiidenberg, 2021; Blunt in Blunt et al., 2021)*. This legislation was a key instigator for the pursuit of 'wide-net' approaches to algorithmic content moderation that is discussed in this report.

Community reports and sex worker rights groups have highlighted the inherent injustice of laws being created about sex workers without their input, leaving them subject to regulations they had no role in shaping or advocating for *(NSWP, 2018; Hacking//Hustling, 2020a, 2020b)*. This historic imbalance is now also playing out on platforms where sex workers are affected by platform policies, such as Community Guidelines and Terms of Service, but were not involved in their development. This results in a double bind, where enforcement and criminalisation affect sex workers without their consideration in the process *(Beebe, 2022; Hardy, 2021)*.

In February 2024, the EU's Digital Services Act was enacted to regulate VLOPs [4] and improve transparency and accountability for users. Digital rights experts warn that, despite good intentions, the mechanisms for accessing accountability remain unclear for those most affected by online discrimination *(Aydinalp and Vetter, 2023)*. Additionally, the DSA's definition of 'illegal content' defers to national laws, creating inconsistencies due to differing legality of sex work across different countries *(Tiidenberg, 2021)*.

[4] The European Commission's (2020) definition of VLOPs under the EU's Digital Services Act

2.3 Big Tech: Automated Decision Making, Bias and Context Collapse

Instead of collaborating with sex workers and marginalised communities to create nuanced categorisation models and systems for classifying sex-related political discussions, platforms often opt for a simpler solution: shutting down content. As we navigate the 'post-FOSTA internet,' platforms consistently favour what is safer, faster, and cheaper *(York, 2021, p. 151)*.

Despite their position in shaping social structure, VLOPs such as Meta and X are driven by profit, their stakeholders, and the geographical-legislative climate they operate in *(Swords et al., 2021; York, 2021)*. When making decisions about community guidelines, these corporations default to conservative values to avoid isolating advertisers or jeopardising their revenue streams *(Stardust, 2018, p. 9)*. These corporations also regularly exercise double standards around who is allowed to violate community standards. A 2025 report by AI Forensics revealed that in 2024, Meta allowed over 3,300 pornographic adverts, many featuring AI-generated content, on its platforms, including Facebook and Instagram *(AI Forensics.org, 2025; NewScientist, 2025)*. When researchers reuploaded these images as private content, they were immediately flagged by Meta, highlighting how adverts can dodge content moderation systems as long as they generate revenue for Meta.

Automated content moderation has been around for years, but the COVID-19 pandemic marked a 'move towards near full automation' *(York, 2021, p. 213)*. Advocates argue that relying on algorithms for this task is preferable to repeatedly exposing human moderators to potentially harmful content *(TechCrunch, 2024)*. However, a closer examination reveals several significant challenges with algorithmic approaches:

2.3.1 DATA QUALITY AND BIAS

Algorithms reflect the biases of the data they are trained on, perpetuating established offline biases online *(Tiidenberg and van der Nagel, 2020; Swords et al., 2021)*. This leads to the censorship of content connected to racialised bodies, queer sex, or non-normative sexual practices, even when these do not violate Community Standards *(Gillett et al., 2022)*.

2.3.2 ACCOUNTABILITY CONCERNS

Even with improvements in algorithmic accuracy for classifying content, fundamental accountability issues remain. The standards used to develop these systems are often unclear, and the decision-making process lacks transparency. Enhancing accuracy does not absolve platforms of their responsibility to establish fair and just content moderation policies in the first place *(Gorwa, 2020)*.

2.3.3 CONTEXTUAL CHALLENGES

Algorithms are notoriously poor at applying context, which is crucial for decisions about sex *(Blunt and Stardust, 2021)*. Most algorithms use a 'wide-net' content moderation strategy to determine what content is censored. This approach has decreased the amount of pornography on major social media platforms, but has also swept away LGBTQ+ and racialised content, sexual health and education content, non-sexual adult nudity, and sex workers' accounts *(Are, 2021)*.

3. Platform Accountability in the Context of Sex Workers' Rights

Platforms acknowledge their role in accountability procedures, however user 'safety' or accountability concerns are often used to justify moderation policies that prioritise profitability *(York, 2021, p. 220)*. Without regulation, platforms will continue to use the concept of accountability to justify economically motivated policy changes that harm marginalised users while protecting their investments. The recent decision of Meta to cut centralised fact-checking and remove restrictions on discussions about issues like migration and gender, all in the name of protecting "free speech" is an example of this strategy in action. Platforms use concerns about "safety" and "freedom" to justify moderation decisions that discriminate against the most marginalised users *(WIRED, 2025)*. Ultimately, X and Meta are businesses, which means the intention behind these so-called "accountability" measures can be explained by the need to remain profitable in the current political climate in the US. Their suggestion that online harm is primarily caused by a few 'bad actors' rather than the platforms' own community standards, effectively absolves platforms of responsibility and reinforces the false idea that platforms are 'neutral custodians', rather than enforcers of social and cultural inequalities *(Gillett et al., 2022, p.5; Gorwa, 2020)*.

Acknowledging that platforms do contribute to international structural inequalities, it becomes necessary to reframe platform accountability. Platforms must be held responsible for developing inclusive content moderation strategies in collaboration with the marginalised communities they claim to protect. This prompts a re-evaluation of several key questions surrounding the concept of "platform accountability" and its application to sex workers. What would a sex worker inclusive content moderation strategy look like? Would such a strategy alone improve platform accountability for the sex work community, or does it depend on other factors? What legal and social barriers need to be considered in regulating and supporting more inclusive platforms policies? Which structures or organisations are empowered to ensure that platforms meet their responsibilities, and what would that involve? *(Manifesto for Sex Positive Social Media, 2022)*. These questions are central to the concept of platform accountability, which involves holding social media platforms responsible for their impact on users, especially marginalised communities *(Tiidenberg, 2021)*.

Data and Methodology

ESWA held an in-person focus group with 16 sex workers from ESWA member organisations at the first ever Convening on Sex Work, Technology and Human Rights in Madrid in April 2024[5]. We used the findings from this initial focus group to shape our methodology and explore the issues sex workers face on social media. Qualitative data for this community report was then collected through three semi-structured online focus groups with sex workers between August and September 2024. The call for focus group participants was distributed through ESWA's mailing lists and social media accounts. Participants were chosen based on their gender, race, migration status and country to ensure a diverse sample. ESWA ensured informed consent was taken before the focus groups. Each focus group was approximately 90 minutes long and had on average eight participants per group. Participants were asked to share their current experiences on social media, their views on popular accountability solutions, their ideas for sex-worker inclusive platform design and features, and their thoughts on the Digital Services Act. All focus group participants were compensated (30 Eur) for their time.

ESWA also conducted semi-structured one-on-one interviews with six academics and technical experts currently working in the field of platform regulation and accountability. Some also had lived experience as sex workers or were members of communities currently experiencing discrimination on social media platforms. These interviews lasted around 90 minutes and included Eliza Sorensen and Lola Hunt (Assembly Four), Dr Zahra Stardust, Jillian C. York, Dr Carolina Are and Rachel Griffin. The results from these in-depth consultations were cross-referenced with the results from our three focus groups with sex workers. Thematic analysis of the data was used to develop high-level recommendations that are informed directly by sex workers' diverse lived experiences.

[5] https://www.eswalliance.org/convening_programme

How many online focus group participants did we have in total? **20**

Countries where participants were actively working:

UK, Sweden, Belgium, France, Switzerland, Germany, Netherlands, Cyprus, Ireland, Spain, Austria, Greece, Romania, USA, Thailand and Singapore.

Migration Status:

60% of participants said that they had migratory sex work experience, which means they were working in countries where they did not have citizenship.

Race: 45% of participants identified as non-white.

Gender: 40% of participants said they did not identify with the gender they were assigned at birth.

How did participants use social media?

- Community connection (fetish communities, sex worker communities, gender/race based communities)
- Finding clients
- Information and resources (getting medication; seeking health advice)
- Activism and politics (sex work)
- Activism and politics (e.g. AIDS awareness; international politics)
- Personal connection

Types of sex work:

- Camming
- In-person full service
- Online and in-person BDSM work
- Sugar babying
- Subscription sites (OnlyFans)
- Commission videos
- Unspecified other forms of online sex work
- Phone work

What social media our participants were using:

- X (formerly Twitter)
- Dating apps. (including Hunqs; Romeo; Grindr; Feeld; Tinder; Lex; Hinge)
- Instagram
- Facebook
- Reddit
- LinkedIn
- Snapchat
- Discord
- Fetlife

In the following chapters, we present our findings and recommendations based on the analysis of data collected from the focus groups and interviews. These findings are categorised into three main sections:

1. **Platform-Related Findings:** *Insights and issues related to the digital platforms used by sex workers.*
2. **Government and Policy Findings:** *Observations and recommendations relevant to government bodies and policymakers.*
3. **Cultural and Civic Findings:** *Key points relevant for cultural and civic entities.*

Executive Summary of Recommendations

1. RECOMMENDATIONS FOR PLATFORMS

1.1 To address algorithmic bias and discriminatory content moderation practices platforms need to

- **Acknowledge and Address Algorithmic Biases:** *Recognise and address sex-negative biases embedded in content classifiers.*
- **Algorithmic Nuance:** *Design algorithms that can differentiate between social, political, creative, personal, and soliciting discussions about sex and sex work.*
- **Algorithmic Transparency:** *Provide transparency around automated content moderation internal processes and address concerns around the over-monitoring of known or suspected sex workers' accounts.*
- **Account Prioritisation Options:** *Provide sex workers and advocacy groups with options to add accounts and review prioritisation lists to prevent wrongful content removal.*
- **Human and Regional Sensitivity:** *Re-evaluate and invest in responsible, sustainable, and ethical human moderation structures sufficiently resourced to handle the context-heavy nature of adult nudity and sex-adjacent content via specific, regional human moderators and more decentralised content moderation systems.*
- **Hybrid Content Moderation Systems:** *Implement hybrid moderation systems allowing user-controlled tagging and categorisation that preserves content discoverability, alongside inclusive and robust centralised moderation that protects marginalised users from hate speech and malicious flagging.*

1.2 To address discrimination in Terms of Service and Reporting Mechanisms platforms need to

- **Collaborative Policy Design:** *Collaborate with sex worker rights groups to shape Terms of Service and Community Guidelines that are inclusive, and transparently and consistently enforced.*
- **Transparent Enforcement:** *Be clear about what is being tracked and censored and accept responsibility when enforcement decisions are made.*
- **Transparent Reporting and Redress Systems:** *Establish accessible, transparent mechanisms for reporting and addressing both individual complaints and broader discriminatory practices in platform policies.*
- **Content Restriction Tracking:** *Allow users to view a comprehensive record of restricted content, including details on content treatment and the rationale behind each decision.*
- **Avoid Repeat Flagging:** *Ensure content previously reviewed and restored is not repeatedly flagged by automated systems.*

1.3 To address discrimination and bias within organisational structures platforms need to

- **Cultural Competency Training:** *Deliver training led by sex workers to combat internal biases and stigmas within platform teams.*
- **Comprehensive Risk Assessment:** *Adopt a more comprehensive risk assessment framework that considers the risks posed by biases within platforms' policies which is overseen by independent external bodies.*
- **Structural Inclusion of Sex Workers:** *Engage sex workers in platform design and evaluation processes, adopting co-designed, decentralised features to avoid isolating their content. Make sure sex workers also occupy positions on external audit boards.*
- **Support for Decentralised Networks:** *Provide resources to aid sex workers in building safe, decentralised social media spaces.*
- **Commitment to Mainstream Inclusion:** *Ensure that sex workers are considered a group necessary for inclusion on mainstream social media platforms and listen to sex workers demand to not be "siloed".*

2. RECOMMENDATIONS FOR GOVERNMENTS AND POLICY MAKERS

Governments and Policy Makers must

- **Decriminalise Sex Work:** *Decriminalise sex work; listen to sex workers' specific demands around online sex work and the nuances of decriminalisation in this space.*
- **Anti-Discrimination Protections:** *Integrate anti-discrimination protections into decriminalisation frameworks aligned with diversity and equity standards.*
- **End the Conflation of Trafficking and Sex Work:** *Consult with sex workers, rights organisations, and anti-trafficking groups to establish a clear and legally recognised distinction between consensual sex work and trafficking.*
- **Repeal FOSTA/SESTA:** *Dismantle harmful legislation that conflates trafficking with sex work.*

The EU Digital Services Act

- **Incentivise Third-Party Support:** *National governments and EU bodies should establish and fund partnerships with sex worker rights and digital rights organisations to support marginalised communities navigating DSA mechanisms. Providing funding for these organisations to offer free legal assistance, anonymity guarantees, and case management would ensure sex workers feel safe enough to engage with the DSA.*
- **Enable Anonymous or Pseudonymous Redress:** *The DSA should permit redress processes that protect the identities of users. This is essential in order to tackle the discrimination faced by the most marginalised members within the sex work community including migrants, trans, and racialised sex workers. Allowing pseudonymous submissions would encourage more sex workers to access the law's protections without fear of exposure.*
- **Establish Local Legal Aid Frameworks:** *In recognition of legal disparities across EU member states, policymakers should provide country-specific resources on DSA protections, particularly in countries where sex work remains criminalised. This approach would address the differences in sex work legality that affects how effectively the DSA can protect sex workers across different jurisdictions.*
- **Develop Precise Risk Assessment Criteria:** *Policymakers should work closely with groups focused on platform-related risks to sex workers to develop and refine specific risk criteria. This will help ensure that VLOPs accurately identify and prioritise risks impacting over-censored users, like sex workers, rather than opting for generalisations that dilute the DSA's intent.*
- **Digital and Civil Rights Groups:** *Leverage the DSA's mandates on anti-discrimination and accountability to hold platforms responsible for the equitable treatment of marginalised communities, including sex workers.*

3. RECOMMENDATIONS FOR CULTURAL AND CIVIC ENTITIES

3.1 Peer to peer sex worker organisations must

- Visibility Campaigns: *Foster and support visibility campaigns that do not endanger sex workers through deplatforming or unwanted exposure.*
- Support Programmes for Platform Navigation: *Establish support programmes to help sex workers navigate complex reporting systems; offer step-by-step guidance on documenting incidents, preparing evidence, and submitting reports effectively. Create accessible, user-friendly guides on platform policies, moderation rules, and redress options specifically for sex workers.*
- Tracking and Analysis of Reporting Outcomes: *Compile case studies of reporting outcomes, whether positive or negative, in order to track patterns in platform accountability.*
- DSA Third Party Support: *Be prepared to walk sex workers through knowing and practising their user rights afforded by the DSA.*

3.2 Digital rights organisations must

- Strengthen Connections with Sex Worker Groups: *Prioritise partnerships with sex worker-led organisations to understand their specific digital accountability needs.*
- Leverage Regulatory Advances: *Use anti-discrimination provisions under the DSA to demand platform transparency, conducting joint risk assessments with sex workers.*
- Privacy-Respecting Verification: *Advocate for privacy-respecting verification alternatives, such as user tagging and pseudonymous validation, over invasive surveillance.*

3.3 Civic entities must

- Digital and Sexual Education Advocacy: *Promote improved sex education and digital literacy in place of heightened age-verification measures.*
- Balanced Online Safety Frameworks: *Advocate for balanced online safety frameworks that prioritise freedom of expression and dignity for all digital citizens, including marginalised groups such as sex workers.*

Chapter One: Findings and Recommendations for Platforms

In this chapter, we categorise the accountability issues related to platforms into three separate issues:

1. Context problems (algorithmic bias and content moderation)
2. Transparency problems (terms of service and reporting mechanisms)
3. Structural problems (rethinking platform design)

The recommendations made to address each of these issues are designed to be implemented simultaneously and are summarised at the end of each section.

1. CONTEXT PROBLEMS: ALGORITHMIC BIAS AND CONTENT MODERATION

1.1 Improving Algorithms

Findings from our focus groups confirmed that even when sex workers self-censor and attempt to adhere to guidelines and rules set out in platforms' Terms of Service and Community Guidelines, their content is still removed:

> "Personally, I've lost two Instagram accounts. So now I really don't post anything, because I find out that when I post information or post, you know, personal things I would love to share, my accounts get banned. I should be able to share a day in my life as a sex worker without necessarily posting or displaying nudity in those pictures or videos that I've made. I didn't in any way display nudity."
>
> **- S. Miller, Ireland**

[6] META's Terms of Service regarding sexual solicitation https://transparency.meta.com/en-gb/policies/community-standards/sexual-solicitation/ [accessed 23.10.2024].

> "I'm one of the activists in Eastern Europe for HIV prevention and STIs. And every single time I'm posting 'somebody's out of meds and the hospital isn't doing anything', I'm flagged instantly or taken down."
>
> **- Alex, Romania**

All 20 participants said they had experienced some form of content moderation which had led to either specific content being taken down, shadow banning, or account deletion. In many cases, without the possibility of appeal. Wrongful content moderation decisions were also more frequent if an account already had a history of being flagged or if that worker was out as a sex worker on other platforms. Some participants revealed that they no longer use social media or certain dating apps because of repeated account suspension.

Sex workers often sit at the intersection of multiple forms of marginalisation around aspects such as ethnicity, gender and sexuality. This means that sex workers are already more likely to experience discrimination based on protected characteristics and therefore are vulnerable to the well-known existing structural biases in algorithmic decision making *(Gorwa, 2020)*:

> "I think it's been a couple of months that the word 'cis' is getting banned [on X]. I'm trans. So sometimes I use the word 'cis' and sometimes I forget that I have to use an exclamation mark instead of an 'i' to say the word or tweet it and there's literally nothing I can do against it."
>
> **- M, Germany**

Sex-negative algorithms and content classifying systems are limiting users who do sex work and are also leading to the silencing of sex worker activism and advocacy groups who use social media to organise:

> "We [OTRAS, the Spanish Workers Union[7]] got our account banned on Instagram and we had, I think it was 10,000 followers. We got banned for no particular reason, and we appealed, but we didn't manage to recover the account, so we had to start from scratch. We had worked so hard against the algorithm and tried to make the account so visible.. it just feels very arbitrary. We did not get due process."
>
> **- Miquel, Spain**

Dr. Zahra Stardust, Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee, is a sexuality scholar and human rights advisor whose research has made significant contributions to the fields of sex work and digital governance. During our interview, Dr Stardust highlights that there is a crucial difference between making algorithms transparent and making them accountable:

> "People are often talking about accountability, but they're only focused on transparency of the algorithms, or fairness, or explainability in machine learning. But there's no point in having explainable algorithms that are still discriminatory, these things still need to be levers that then lead to accountability."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

Dr. Carolina Are, Innovation Fellow at the Northumbria University Centre for Digital Citizens, is a platform governance researcher and practitioner who specialises in the intersection of content moderation, online abuse, and the censorship of bodies and sexuality. During our interview, Dr Are stated that a lack of transparency around algorithmic moderation fosters a sense of identity collapse that is extremely harmful to sex workers who use social media:

> "...if you're out as a sex worker on those platforms, you are moderated as a sex worker no matter what you do, which I think is one of the most discriminatory practices that platforms have, where I've had participants tell me that pictures of them in a tracksuit, hanging out with their family and friends was moderated as sexual solicitation. So if you're a sex worker, you're always doing sex work: you can't go out and eat ice cream or, you know, share a piece of news or a petition, because platforms always assume that you're soliciting... That shows that those tools themselves, particularly the algorithmic moderation, are really not working correctly."
>
> **- Dr. Carolina Are**
> *Innovation Fellow at the Northumbria University Centre for Digital Citizens*

[7] OTRAS https://sindicatootras.org/

To create a more inclusive content moderation system for sex workers, platforms must develop content moderation classifiers that allow for nuance in the topic of sex. Platforms must also accept the current limitations of algorithmic moderation systems in handling nuanced topics like sex and sex work and acknowledge the need for human oversight. Platforms need to provide transparency around their content moderation algorithms to address the over-censorship that disproportionately affects sex workers and address concerns around the over-monitoring of known or suspected sex workers' accounts.

Summary of Recommendations:

- **Acknowledge and Address Algorithmic Biases:** *Recognise and address both specific sex-negative bias and traditional forms of bias embedded in content classifiers.*
- **Algorithmic Nuance:** *Design algorithms that can differentiate between social, political, creative, and personal discussions about sex and sex work.*
- **Algorithmic Transparency:** *Provide transparency around automated content moderation internal processes and address concerns around the over-monitoring of known or suspected sex workers' accounts.*

1.2 Human Moderation

Human and digital rights advocates have argued that 'fully automated decision-making systems that do not include a human-in-the-loop are dangerous' and therefore 'human and institutional oversight is essential' (Duarte et al., in Gorwa, 2020, p. 8). When asked, some focus group participants were enthusiastic about the idea of hiring sex workers specifically to handle the context-heavy task of moderating content by and for sex workers.

Meta (Instagram, Facebook, Threads) acknowledges that human reviewers make better decisions than technology in ambiguous cases, necessitating prioritisation for specialised human review. However, Meta argues that content review for aspects such as adult nudity is "straightforward" and instead prioritises posts from high-visibility public figures via their system, CROSS-CHECK, as opposed to content from users at risk of over-moderation, such as sex workers. In 2021, Meta asked its external auditing body, the Oversight Board, to determine criteria for "context-specific decisions" in the CROSS-CHECK system. The Board's 2022 inquiry recommended prioritising expression which is important for human rights and public importance. Meta identifies "Civic Entities" and "Marginalised Populations" as eligible for CROSS-CHECK lists. To improve accountability, sex workers and their respective organisations should be able to add themselves to these lists, though self-declaration is limited to those willing to risk self-identification. An anonymised self-declaration system should be developed, as far as that is possible for those that are able to take the risk.

[8] Meta https://transparency.meta.com/enforcement/detecting-violations/technology-helps-prioritize-review/ [accessed 24.10.2024].

[9] Meta https://transparency.meta.com/policies/community-standards/adult-nudity-sexual-activity/ [accessed 24.10.2024].

[10] Meta https://transparency.meta.com/enforcement/detecting-violations/reviewing-high-visibility-content-accurately/ [accessed 18.01.2024]

[11] Oversight Board, 2022 https://www.oversightboard.com/news/501654971916288-oversight-board-publishes-policy-advisory-opinion-on-meta-s-cross-check-program/ [accessed 15.05.2024]

However, encouraging platforms to invest in additional human moderation to address algorithmic discrimination has limitations. Dr. Are highlights the bias in human review as well as how under resourcing of this labour impacts the decisional outcomes:

> "The platforms that we're using are already massively sex negative, and because a lot of moderators have very little time and are in different countries and may not know contextual nuances of content: if they've received multiple reports about something, they tend to action it. If it goes back to a moderator again, and if it's deleted again, then [human reviewers] tend to say, "Well, it's been reported. I'm just going to get it down" because they are aiming for efficiency and speed rather than the decision being correct."
>
> **- Dr. Carolina Are**
> *Innovation Fellow at the Northumbria University Centre for Digital Citizens*

To mitigate bias in human moderation systems, reviewers must receive anti-bias training tailored to specific regional contexts. A potential approach discussed in interviews involves outsourcing training and/or content moderation to regional organisations, which could better handle context-sensitive material. Jillian C. York, Director for International Freedom of Expression at the Electronic Frontier Foundation, is a writer and activist whose work focuses on the impact of state and corporate censorship. During our interview, York cautioned about the limitations of outsourcing human review:

> "I think it works in certain contexts, but in other contexts it creates risk in the sense that you have to truly entrust in a local organisation and trust that there isn't bias. I think this might be something that could be really issue specific. Another thing is that I think it can also put too much burden on civil society organisations. How does it work in terms of payment, in terms of support?"
>
> **- Jillian C. York**
> *Director for International Freedom of Expression at the Electronic Frontier Foundation*

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[12] Assembly Four https://assemblyfour.com/

[13] Switter https://assemblyfour.com/switter

We interviewed Eliza Sorensen and Lola Hunt: founders of sex worker technologist collective Assembly Four[13] which was responsible for Switter, a sex worker-run social media space created in the aftermath of mass account losses post FOSTA/SESTA[13]. Hunt agreed that the human cost of moderation is often overlooked:

> "Moderation has a human cost, and a lot of that human cost is worn by folks in the Global South, and a lot of it is also hidden behind the idea that the algorithm does everything. The algorithm does some things, but when the algorithm fails, it means that there are people who have to sort through the nuances of that content at their own expense."
>
> **- Eliza Sorensen and Lola Hunt**
> *Founders of sex worker technologist collective Assembly Four*

The exploitative practices underlying current human review systems highlight the ethical and sustainability concerns associated with existing models (York, 2021). Addressing these issues requires platforms to reconsider and invest in responsible, sustainable, and ethical human moderation practices. This could include partnerships with civil society organisations, as well as providing comprehensive financial, structural, and psychological support to human moderators, particularly those outsourced through private firms.

Summary of Recommendations:

- Account Prioritisation Options: *Provide sex workers and advocacy groups with options to add accounts and review prioritisation lists to prevent wrongful content removal.*
- Human and Regional Sensitivity: *Re-evaluate and invest in responsible, sustainable, and ethical human moderation structures sufficiently resourced to handle the context-heavy nature of adult nudity and sex-adjacent content via specific, regional human moderators and more decentralised content moderation systems.*

1.3 User-Controlled Tagging (#NSFW)

One of the most popular recommendations from the sex workers in the focus groups was the idea of user-controlled tagging and filtering. This would reduce the burden on algorithmic or human content moderation. Such features would enable users to classify their own content (e.g., as Not Safe For Work "NSFW") and allow audiences to selectively filter content according to their preferences:

> "I think folks would actually love more control to curate their content and would find it valuable. It could be profitable. The platforms should take note. Folks are so overwhelmed with information, I would pay more to filter out what I don't want."
>
> **- Lily, Germany**

User-controlled tags 'can both flag and contextualise sex, as a user-driven label and as a metadata tag'; 'it can be searched for or avoided' making it multidirectional *(Tiidenberg and van der Nagel, 2020, p.77-78)*. In focus group three, Anna emphasised that multidirectional user-controlled tagging and filtering would empower sex workers to target specific posts or content to different audiences within their network. This approach could address issues of 'identity collapse,' where sex workers find that all their content is treated the same:

> "I think people should determine what type of content they want to see because it allows me to centre who I want to see my post."
>
> **- Anna, Ireland**

Studies highlight the advantages of such filtering. Jillian York writes that user-controlled filters allow individuals "to select what they want to exclude from their own feeds" *(York, 2021, p. 161)*. For example, the social media platform Bluesky implements a combined approach of user-controlled filtering alongside centralised content moderation.[14] User-managed tagging could help reduce reliance on low-paid content moderators and prevent content from being universally suppressed, instead allowing it to be tailored to specific user preferences.

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[14] Bluesky https://docs.bsky.app/docs/advanced-guides/moderation

[15] Dr Carolina Are, LinkedIn https://www.linkedin.com/feed/update/urn:li:activity:7283636164513660929/ [accessed 18.01.2025]

During our interview, York added:

> "I think that it only really works as a hybrid, that you can't completely put trust in users, because then how do you deal with things like child exploitation?"
>
> **- Jillian C. York**
> *Director for International Freedom of Expression at the Electronic Frontier Foundation*

York's comment highlights the inherent dangers of outsourcing content moderation to users. Meta's recent decision to allow users to fact-check each other represents a significant and dangerous setback in the pursuit of increased accountability for sex workers and other marginalised groups online. These users now face increased exposure to gender, sex and race-related hate speech on a daily basis from others whose content will no longer be centrally moderated *(WIRED, 2025)*. Dr. Are's research further confirms that decentralised fact-checking and unregulated user content is frequently "weaponised against already discriminated users"[15], leading to deplatforming and silencing.

Further challenges with user-controlled tagging concern engagement and visibility. For instance, in focus group two M described how:

> "I think on Twitter you can actually tag your profile as 'not safe for work', but then it's harder to find, you need like the exact username, or the exact '@"' and also before or when you post a photo or video, you can also tag it as nudity but then people on their feed will have to click to see the photo, and that's taking engagement as well."
>
> **- M, Germany**

To promote fairness, NSFW tagging should categorise content without limiting its discoverability or reach. For major platforms, a "hybrid" system of user-controlled tagging, combined with existing human and algorithmic moderation, is recommended. However, the introduction of user-controlled tagging must be accompanied by robust, inclusive, centralised moderation systems to protect marginalised users from harm directed at them by other users.

Summary of Recommendations:

- **Hybrid content moderation systems:** *Implement hybrid moderation systems allowing user-controlled tagging and categorisation that preserves content discoverability, alongside inclusive and robust centralised moderation that protect marginalised users from hate speech and malicious flagging.*

2. TRANSPARENCY PROBLEMS: TERMS OF SERVICE AND REPORTING MECHANISMS

2.1 Developing Inclusive Terms of Service

A major barrier to accountability that platforms must address is the lack of transparency. This includes their failure to provide clear, consistent, and publicly available posting criteria or 'Terms of Service' (ToS):

> "The rules keep changing."
>
> - Julius, Cyprus

> "It feels like a minefield...it seems like the target is always shifting...sometimes it just seems so arbitrary. For example, I had a post taken down because I had half of a woman's face covered, but I had tied the face covering with rope, and that wasn't allowed."
>
> - M, Germany

Many focus group participants commented on the anxiety that the arbitrariness of ToS on platforms creates: "not knowing what new rule will drop tomorrow" (M, Germany) and not writing "specifically what they really want to not be shown" (Lucy, UK). This leaves sex workers in a constant state of caution:

> "I would like transparent guidelines on what can or cannot be posted."
>
> - Lily, Germany

To promote accountability, platforms must develop and implement clear, inclusive, and transparent ToS that support decisional transparency. The Santa Clara Principles on Transparency and Accountability[16] (2018) highlight three central and recurring demands: clarity in decision-making, enforcement and appeals. According to these principles, such transparency is crucial for "allowing both ordinary users and critical experts to understand the patterns of governance within which they are embedded" *(Santa Clara Principles, 2018 cited in Gorwa, 2020, p. 11).*

Currently, Meta's Terms of Service [27] regarding sexual solicitation state:

> "We also allow for the discussion of sex worker rights advocacy and sex work regulation. We draw the line, however, when content facilitates sexual encounters or commercial sexual services between adults."
>
> "We also restrict sexually-explicit language that may lead to sexual solicitation because some audiences within our global community may be sensitive to this type of content, and it may impede the ability for people to connect with their friends and the broader community."
>
> **- Meta's Terms of Service**

Despite these provisions, focus group participants and advocacy account managers report frequent instances of censorship, even when their content aligns with Meta's stated terms. To foster genuine accountability, platforms must actively collaborate with sex worker rights groups in shaping ToS and Community Guidelines that are inclusive, transparent and consistently enforced.

In conclusion, platforms can enhance accountability to sex workers by developing ToS in collaboration with sex worker rights organisations, ensuring they are inclusive and transparent. Clear and equitable ToS will provide essential decisional transparency, allowing sex workers to understand and navigate platform regulations more effectively.

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[16] Originally developed in 2018 and updated in 2021, the Santa Clara Principles on Transparency and Accountability in Content Moderation were compiled intersectionality between "human rights organisations, advocates and academic experts", in response to platforms "increasingly aggressive moderation of users".

[17] Meta https://transparency.meta.com/en-gb/policies/community-standards/sexual-solicitation/ [accessed 24.10.2024]. [accessed 18.01.2025]

Summary of Recommendations:

- **Collaborative Policy Design:** *Collaborate with sex worker rights groups to shape Terms of Service and Community Guidelines that are inclusive as well as transparently and consistently enforced.*
- **Transparent Enforcement:** *Be clear about exactly what is being tracked and censored and accept responsibility when enforcement decisions are made.*

2.2 Transparent Redress Mechanisms

Lack of transparency also includes inadequate redress mechanisms for users who are wrongly or maliciously reported or subjected to hate speech. It also refers to the failure to address double standards in censorship and surveillance practices

> "The other thing is when I find something super offensive, and I flag it to Instagram, all the time it comes back "we didn't find anything on that post". How can you flag me for no reason, or for political reasons, or for showing a bit of skin, and then other [users] are threatening life and so on, and you don't find anything [wrong with their posts]? How is this working properly?"
>
> **- Alex, Romania**

> "Content moderation on X is crazy to me. They have like, open Nazis, there's openly Nazi accounts."
>
> **- Femme, Austria**

None of the 20 participants in our focus groups shared experiences of successful or good appeal processes when trying to restore their accounts or content, despite their efforts. Many described feeling 'threatened' with removal, not only from the platforms, but from other users who targeted their accounts without consequence. This fear discouraged them from reporting abuses:

> "I also had some activist groups that are anti-sex worker that have reported me as well... I have a fear that reporting will draw more attention to my account from the social media platform regulators."
>
> **- Lily, Germany**

> "I never really report because I feel like the system is against us."
>
> **- Lucy, UK**

Comprehensive reporting mechanisms are crucial if platforms implement more user-centred tagging, as discussed earlier. To ensure accountability, platforms must be transparent about what they restrict. When someone appeals against a take-down decision, the platform must respond, acknowledge the decision, and provide clear evidence of how that user or content has breached their Terms of Service.

During our interview with Eliza Sorensen and Lola Hunt from Assembly Four, Hunt discussed the covert shadow banning that the sex-worker-run Tryst-blog[18] experiences on Instagram. They highlighted how users face restrictions, but are not able to make an appeal or report against it because the platform denies imposing any restrictions in the first place:

> "Sometimes they remove features from us so we're not able to use scheduling. Sometimes they just flat out remove it without saying anything. I should say, we don't get flagged for stuff, it doesn't come back as a report. So we don't actually know why we're shadow banned or why we're losing the ability to use different features. We just experience it. I wouldn't be surprised if it has to do with the fact that we are running a blog for sex workers and by sex workers."

In our interview with Dr Are, she notes that transparency requires platforms to maintain case records for each user. These records should clearly show lists of all restricted content, the type of restriction applied, such as deprioritisation or removal, and the justification for each decision:

[18] Tryst https://tryst.link/blog/

> "Appeals need to work. When it comes to the transparency aspect, we currently do not have access to a case record of everything that's been decided about our content. You don't see a case log of decisions. I hope that is a change that is implemented, because then it is easier to make the case for your content and your account being reinstated, even if you're offline."
>
> **- Dr. Carolina Are**
> *Innovation Fellow at the Northumbria University Centre for Digital Citizens*

Finally, platforms should ensure that content previously reviewed and restored is not flagged again in future sweeps. Dr. Are notes:

> "..the appeals are now taking longer. And on top of that, when you post something, maybe that gets successfully reviewed and appealed, but as soon as you post something else, the old content that has already been appealed and reviewed gets picked up with that."
>
> **- Dr. Carolina Are**
> *Innovation Fellow at the Northumbria University Centre for Digital Citizens*

Summary of Recommendations:

- Transparent Reporting and Redress Systems: *Establish accessible, transparent mechanisms for reporting and addressing both individual complaints and broader discriminatory practices in platform policies.*
- Content Restriction Tracking: *Allow users to view a comprehensive record of restricted content, including details on content treatment and the rationale behind each decision.*
- Avoid Repeat Flagging: *Ensure content previously reviewed and restored is not repeatedly flagged by automated systems.*

3. STRUCTURAL BIAS: RETHINKING PLATFORM DESIGN

3.1 Accounting for Bias and Re-thinking Risk

In our interview with content governance researcher Rachel Griffin, emphasised that current platform redress mechanisms fail to tackle deeper systemic issues. While users can appeal individual decisions, these mechanisms do not challenge problematic policies, such as overly broad bans on sexual content, that disproportionately impact sex workers:

> "So if you have a platform that says: 'well, our policy is to totally ban anything that is sexual', which is a very subjective, very vague descriptor, you can complain if you think that they didn't apply that policy correctly, but you can't complain and say, 'this is a stupid policy'."

Dr. Stardust also notes that technical solutions alone cannot resolve accountability issues. They risk reinforcing "tech solutionism" - the reliance on technology to solve inherently political issues. Instead, platforms must engage in sensitivity and cultural competency training to address the stigma surrounding sex work. By fostering internal anti-discrimination principles, they can develop more inclusive content moderation policies and staff training:

> "I do feel like design features won't save us, design features are useful, but then they do sometimes move into a tech solutionism focus - [the idea that] more tech and that will solve problems which are actually political problems, which are actually about whorephobia. So we need to address sexual shame and whorephobia if we actually make an online space that's safer for sex workers."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

Dr Stardust equally cautions against viewing cultural competency training as a "fix-all" solution to dismantling structural discrimination, emphasising the importance of pursuing multiple approaches to platform accountability at the same time.

Instead, a crucial step is to rethink the current approach to user safety, which often attributes harm to individual "bad actors" rather than recognising it as a structural issue *(Gillett et al., 2018, p.9)*. All of the academics and technologists interviewed for this report suggested adopting a more comprehensive risk assessment framework - one that considers the risks and biases embedded within platform policies themselves. This approach could offer a more effective way to ensure that marginalised users, including sex workers, are treated equitably:

> "We did some research a couple of years ago where we looked at newsroom posts from five prominent digital platforms over a five year period, like Facebook, YouTube, Tiktok, Tinder and Twitter, and we looked at how they were thinking about issues of harm and safety... There were four key themes that we found, and one was that they're concerned about locating harm within "bad actors" and discrete content objects, so it's not a structural problem. There's individual bad people that we need to get off our platform, or they're also framing surveillance and policing as solutions to harm when we know that policing and prisons probably won't create better sexual communicators or ethical people...they also perform diversity and inclusion work in very tokenistic ways...they're proactively proposing solutions that then serve as justification for their own investment in scaling up of automation and data intensive surveillance and their verification technologies."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

Meta's Oversight Board demonstrates some progress in addressing structural concerns, at least within Meta's platforms. Dr. Carolina Are points to the Board's decisions as a potential model for accountability, as it has overturned content moderation rulings and called for clearer, human rights-based standards. For instance, recent rulings have advocated for explicit criteria in Meta's Adult Nudity and Sexual Activity[20]. Dr Are recalled during our interview:

> "I go back to the gender and nudity case. I think that [was] life changing because even I, as a researcher, when I was trying to prove that malicious flagging was happening, was being met with so much backlash. The platforms would say, 'No, that's not happening'. Having the Oversight Board saying 'malicious flagging does happen to users and content at risk' was life changing to me, because I had something to cite that wasn't just user experience."

The impact of these recommendations will be limited by legal restrictions on platforms related to the legality of sex work. Therefore, they must be pursued alongside policy-level advocacy for the decriminalisation of sex work, as discussed in the next chapter.

Summary of Recommendations:

- **Cultural Competency Training:** *Deliver training led by sex workers to combat internal biases and stigmas within platform structures and teams.*
- **Comprehensive Risk Assessment:** *Adopt a more comprehensive risk assessment framework - one that considers the risks posed by biases within platforms' policies themselves that is overseen by independent external bodies.*

3.2 Including Sex Workers

A key recommendation from our consultations is that platforms should actively include sex workers in designing and evaluating their systems and policies. When asked to describe features and values that would characterise a truly inclusive platform, focus group participants offered the following insights:

> "Social media ruled by sex workers would be a dream."
>
> **- Rosario, France**

> "I envision a social media platform that's inclusive to all, people of different genders, age groups, race and ethnicity. One that is safe and where data privacy is top notch."
>
> **- Z. Fab, Ireland**

> "(I would like to have)...the ability to report digital violence without personal identifying information."
>
> **- Lily, Germany**

[19] The Oversight Board https://www.oversightboard.com/ [Accessed 27.10.2024].

[20] The Oversight Board https://www.oversightboard.com/decision/bun-ih313zhj/ [Accessed 21.10.2024].

Platforms should go beyond consulting sex workers on specific design features and involve them at a structural level. This approach prioritises the needs of those most at risk of discrimination, rather than designing for the comfort of the majority. Including sex workers in both internal and external oversight boards, such as Meta's Oversight Board, would help ensure policies reflect and integrate diverse perspectives and improve platform safety for sex workers.
Eliza Sorensen from Assembly Four emphasised the importance of diverse voices in policy development:

> "Whoever is at the head of these organisations is ultimately going to drive the direction of the type of policies that are being run. And one of the things that we tried to advocate for is: this should be a board of individuals with different experience, because you don't build good policy in isolation."
>
> **- Eliza Sorensen**
> *Founder of sex worker technologist collective Assembly Four*

Summary of Recommendations:

- Structural Inclusion of Sex Workers: *Engage sex workers in platform design and evaluation processes, adopting co-designed, decentralised features to avoid isolating their content. Make sure sex workers also occupy positions on external audit boards.*

3.3 Mainstream Inclusion and Decentralisation

A question raised in both focus groups and interviews with experts is whether meaningful change can be achieved within the existing mainstream social media structures, or if true inclusivity and accountability require decentralised, community-led networks. Dr Stardust's current research explores alternatives to centralised, automated content moderation. Dr Stardust has been interviewing various platforms that see themselves as taking this alternative approach and notes the diversity of strategies for surviving online:

> "One of the platforms specifically was interested in tagging systems, and how we create user-generated tagging systems for content that have a more expansive sexual vocabulary, rather than just the kind of very rudimentary ways in which some platforms allow you to tag sexual content."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

Switter, founded and managed by Hunt and Sorensen from Assembly Four, provides an example of decentralised social media which is run and managed by sex workers for sex workers[21]:

> "What Switter did was it kind of took the place of Twitter [now X], when they did start to deplatform folks. So on Switter, folks were able to advertise, keep in touch with community, share themselves with their colleagues, and still stay connected to the public... It humanised us, like suddenly the public was able to see that we had likes and dislikes and hobbies and like we were fully formed people."
>
> **- Lola Hunt**
> *Founder of sex worker technologist collective Assembly Four*

Crucially, Sorensen and Hunt add:

> "One of the things that was really unique about Switter is that Mastodon allows you to connect to other social media networks, and it allows other networks to make the decision of "I don't want to see this content". So we were able to stay connected as well as you know, classify certain content as not safe for work, we were able to be seen as humans and joke around."
>
> **- Lola Hunt**
> *Founders of sex worker technologist collective Assembly Four*

[21] Assembly Four https://assemblyfour.com/switter [Accessed 27.10.2024].

> "Switter sort of did end up becoming a place where folks who couldn't afford to list on the higher end websites that were charging through the nose for a profile could list for free. They could get work. They could continue working after being deplatformed or losing the advertising site that they had relied on
>
> **- Lola Hunt**
> *Founder of sex worker technologist collective Assembly Four*

Allowing users and communities to control their engagement and self-define content is an effective solution to the context-collapse caused by centralised moderation.

However, findings from our interviews reveal the issues with decentralisation in the current media ecosystem. Compliance obligations and regulatory constraints, as highlighted by Sorensen, impose substantial challenges. This makes it difficult to sustain non-profit, community-operated platforms over the long term. Switter shut down in March 2020. When asked why they made the decision to close the network Sorensen stated:

> "It just wasn't feasible to continue running it under the regulatory climate and threat of age verification when we weren't taking on advertisers or selling user data."
>
> **- Eliza Sorensen**
> *Founder of sex worker technologist collective Assembly Four*

Assembly Four's experience is reflected in the findings of Dr Stardust's ongoing research:

> "When I asked people, what were the breaking points, it was often barriers around seeking funding and finding investors that didn't have bias clauses, or that they had faced censorship across a range of different platforms and they couldn't advertise or promote their work, just the financial and emotional cost of maintaining the sites in the face of censorship."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

These findings suggest that while decentralised social media holds potential as a vehicle for inclusivity and accountability, it is crucial that regulatory and operational demands are supported with adequate resources. Pursuing these initiatives alongside policy advocacy has the potential to create a digital ecosystem that better protects the rights and safety of sex workers.

Findings from our focus groups demonstrate a disparity between what is being talked about at a theoretical level and what sex workers actually feel to be practical. Many sex workers in the focus groups expressed concerns about traffic:

> "As a person, I agree with the decentralising social media thing, but as a sex worker, I feel like it's kind of useless because my audience are like machos, cis-het, rich people that don't think this way, and we kind of have to think like they do, so we can reach them. So if they're using all the mainstream platforms, we have to adjust, even if we don't want to, otherwise we cannot work."
>
> **- Joanne, Greece**

> "Social media that is focused towards a certain community doesn't usually get, you know, the necessary traffic."
>
> **- S. Miller, Ireland**

A key finding was that concerns were not limited to the impact on business, but overwhelmingly directed towards a much more emotional and social concern about being "siloed" away from mainstream media:

> "I like being exposed to other people, to other opinions. I think so many of us already live in such echo chambers, politically and about everything we do in our lives. I love my queer sex positive bubble, and I think it's important sometimes to remind myself that worlds do exist outside of that, because then I can actually move forward in my activism with the way that I live my life with a purpose."
>
> **- S. Miller, Ireland**

Focus group participants pointed out that one solution is the recommendation to have both mainstream inclusion and specific decentralised social networks that are just for sex workers. As Casper Love pointed out:

> "I guess it depends if we want a platform to advertise, or to use it to exchange safety info, or mutual support?"
>
> -Casper, Netherlands

Findings from the focus groups suggest that while sex workers value specific features of decentralised social media, such as user-controlled filtering, a shift to fully decentralised platforms alone would not improve accountability at this time. This is because it would require proper support from the wider regulatory and financial ecosystem. Until these conditions are met, participants emphasised that mainstream social media platforms must be made to include and accommodate them.

Summary of Recommendations:

- Support for Decentralised Networks: *Provide resources to aid sex workers in building safe, decentralised social media spaces.*
- Commitment to Mainstream Inclusion: *Ensure that sex workers are considered a group necessary for inclusion on mainstream social media platforms and listen to sex workers demand to not be "siloed".*

Chapter Two: Findings and Recommendations for Governments and Policy Makers

The accountability measures available to social media platforms are restricted by the legislative contexts in which they operate. While platforms may seek to reduce discrimination against sex workers, it is also the responsibility of governments and policymakers to create legislative frameworks that enable robust accountability measures from the outset.

1. DECRIMINALISE SEX WORK

Criminalisation not only restricts what social media platforms can realistically implement, but it also dissuades sex workers from seeking accountability in the first place because they fear discrimination or legal consequences. Our focus groups highlighted this chilling effect on accountability under criminalisation. As one participant noted:

> "I wouldn't feel secure or represented or think [redress mechanisms] would actually work for me or for other sex workers because sex work is a legal grey area."
>
> **- M, Germany**

> "I think there's a huge gap in online decriminalisation activism because of FOSTA/SESTA."
>
> **- Joanne, Greece**

The criminalisation of sex work pushes workers underground, reducing their ability to seek support when harmed and making it harder for them to operate independently or autonomously. For instance, Suz, a focus group participant, described how restrictive policies have led her to pay others to promote her work, as her own accounts frequently face being taken down:

> "Something that I've been doing differently is I pay people to help me push my account instead of using my main account."
>
> **- Suz, France and UK**

Miquel shared the impact of recent criminalisation legislation in Spain, explaining how laws targeting sex work advertisements forced many sex workers into precarious working conditions with third parties:

> "In Spain, one of the few things that they managed was to 'outlaw' advertising websites for sex work in Spain. Of course, what happened was that they moved outside of Spain. But you had this conundrum that sex workers, particularly the female sex workers, for a month, didn't know what to do and had to go to other places to work for third parties because they couldn't access sex worker advertising sites."
>
> **- Miquel, Spain**

These findings support Dr Zahra Stardust's feedback during the interview, which emphasised that effective decriminalisation must also address the unique nuances of online sex work. This includes recognising that different types of sexual content are influenced by a complex set of laws governing obscenity, decency, and content hosting:

> "We need to think about decriminalisation in terms of online sexual content as well because the conversations about decriminalisation often focus on full service sex work. There are gaps where there are very specific laws around indecency and obscenity or different kinds of sexual content and where you can host it. What does the decriminalisation of online sex work look like?"
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

These insights indicate that, without legal reforms, many of the platform recommendations outlined in Chapter One will face significant barriers to implementation. Efforts to enhance platform accountability that require investment and engagement with sex workers are hindered

by current laws, as stakeholders often avoid perceived risks. Decriminalisation would enable platforms to develop more inclusive policies that address the specific needs of sex workers, making accountability mechanisms both accessible and meaningful.

Recommendation:

- **Decriminalise sex work:** *Decriminalise sex work; listen to sex workers' specific demands around online sex work and the nuances of decriminalisation in this space.*

2. ANTI-DISCRIMINATORY REGULATORY SAFEGUARDS

To increase platform accountability for sex workers, governments and policymakers should implement robust anti-discrimination protections as part of a comprehensive decriminalisation framework. As Dr. Stardust emphasises, decriminalisation should encompass the repeal of laws criminalising sex work and also the enactment of anti-discrimination protections, the expungement of historical convictions, and revisions of regulations that specifically affect migrant and street-based sex workers:

> "There's a lot of talk here about what constitutes decriminalisation – a sense that decrim also involves anti-discrimination protections and involves expungements of historical convictions; that it also repeals laws around HIV and sex work and street-based sex work and addresses the border industrial complex that marginalises migrant sex workers."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

If governments establish anti-discrimination laws specific to sex workers that platforms must follow, this legal framework can compel platforms to undertake meaningful anti-discrimination work, ensuring they meet diversity, equity, and inclusion standards. Requiring platforms to actively work on anti-discrimination and awareness was also a key accountability recommendation in focus groups. Both S. Miller (Ireland) and Miquel (Spain) argued that platforms should be regulated in order to adhere to basic anti-discrimination standards.

Creating anti-discrimination standards for sex workers within legal frameworks depends on governments and international regulators recognising that decriminalisation is essential for upholding human rights for sex workers.

Recommendation:

- **Anti-Discrimination Protections:** I*ntegrate anti-discrimination protections into decriminalisation frameworks aligned with diversity and equity standards.*

3. INCLUDING SEX WORKERS IN POLICY MAKING AND ENDING THE CONFLATION OF SEX WORK AND TRAFFICKING

Digital legislation often fails to distinguish between sex work and trafficking, leading platforms to censor sex workers in the name of "safety" and "protection" from trafficking *(NSWP, 2018; DAZED, 2022; Jones, 2022)*. Assembly Four emphasised that to protect sex workers' rights, governments must respond to the ongoing calls from sex workers to clearly distinguish between consensual sex work and trafficking in legislation that affects both groups:

> "I think unpicking the conflation of human trafficking, sex exploitation, and sex work would be a really good place to start, because that is something that politicians and corporate entities lean on as a way to detract or distract from broader systemic issues that lead people into positions of exploitation or into sex work."
>
> **- Lola Hunt**
> *Founder of sex worker technologist collective Assembly Four*

This issue emerged repeatedly throughout the interviews in this report, emphasising that policies affecting marginalised communities must be crafted in consultation with members of those communities:

> "If we could stop both-siding issues, that would be really helpful. Policy and legislation concerning trans healthcare should involve trans people, and under no circumstances should it involve transphobes. The same goes for sex workers and SWERFs (Sex Worker Exclusionary Radical Feminists): if a group believes that certain people should not exist or do not deserve equal human rights, they should not be considered stakeholders or given a seat at the table...It would also mean that organisations like Mastercard and Visa can't lean on the fact that they're putting discriminatory policies in place because they're 'helping women' or they're 'trying to stop human trafficking'. When that doesn't fly, when there is nuance in that, then things will get better for sex workers, because it will be considered labour and not exploitation."
>
> **- Lola Hunt**
> *Founder of sex worker technologist collective Assembly Four*

Hunt highlights here that such differentiation would prevent financial institutions, like Mastercard and Visa, from justifying discriminatory policies under the guise of preventing trafficking. [22] Instead, the treatment of sex work as legitimate labour would provide protections rather than perpetuate stigmatisation and exploitation.

FOSTA/SESTA[23] was enacted with the stated aim of curbing human trafficking but also serves as a key example of how conflating sex work with trafficking harms both groups. By failing to distinguish between consensual sex work and trafficking *(Section 3 of FOSTA enacted 18 U.S.C. § 2421A)*, the legislation ignores sex work as a legitimate form of labour *(Jones, 2022, p. 74)*. This conflation affects workers in Europe too: 'Most of the world's major social media applications are based in the United States, which enables it to export the repercussions of the stigmatisation and criminalisation of sex work even within the boundaries of countries with differing legislation' *(Beebe, 2022, p. 140)*. This lack of differentiation between sex work and trafficking has resulted in platforms' excessive, risk-averse responses, including widespread content takedowns and over-censorship, disproportionately impacting sex workers who rely on these spaces for work, particularly workers who are trans, racialised, disabled or undocumented as data has shown *(Jones, 2022; Blunt in Blunt et al., 2021)*. FOSTA/SESTA is not the only example of digital focused legislation that conflates sex work with trafficking resulting in increased harms for sex workers. Legislation such as the UK's Online Safety Bill also compels platforms to increase censorship in the name of "safety", which has in turn led to increased harms against sex workers *(Gillett et al., 2022; The Independent, 2024)*. Originally introduced in order to crack down on "harmful online content" such as child sexual abuse material, a clause was later added to the bill 'to include the offence of "inciting or controlling prostitution for gain"[24]. The clause is intentionally vague, leading social media companies to remove sex workers' content despite the fact that, while many aspects related to "solicitation" are criminalised, sex work is legal under current UK law.

Dr Stardust further highlights that digital regulations such as FOSTA/SESTA deter investment in safety technologies for sex workers, as potential partners fear legal repercussions:

> "A number of my participants had experiences where they were working with tech folk, and then when they found out about FOSTA/SESTA, they were worried about their own liability for building the technology and they dropped out over time. They just felt that the platforms weren't worth the risk."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

The combination of broad criminalisation policies with specific digital regulations, such as FOSTA/SESTA, undermines sex workers' autonomy, safety, and well-being. It also makes it nearly impossible for platforms to provide comprehensive accountability. Repealing liability laws such as FOSTA/SESTA is therefore crucial to fostering accountability.
To build true platform accountability toward sex workers, governments and policymakers must address this conflation directly. This means consulting with sex workers, rights organisations, and anti-trafficking groups to establish a clear and legally recognised distinction between consensual sex work and trafficking.

Recommendation:

- **End the Conflation of Trafficking and Sex Work:** *Consult with sex workers, rights organisations, and anti-trafficking groups to establish a clear and legally recognised distinction between consensual sex work and trafficking.*
- **Repeal FOSTA/SESTA:** *Dismantle harmful legislation that conflates trafficking with sex work.*

[22] National Ugly Mugs (2022) Payment Rejected: Financial discrimination against sex workers. See also Beebe, 2022.

[23] See Hacking Hustling 2020; and Blunt in Blunt et al., 2021.

[24] English Collective of Prostitutes (ECP) on the UK's Online Safety Bill (2022) https://prostitutescollective.net/briefing-online-safety-bill/

4. THE EU DIGITAL SERVICES ACT (DSA): ENHANCING THE DSA'S ACCESSIBILITY THROUGH THIRD-PARTY SUPPORT AND IMPROVED RISK ASSESSMENT CRITERIA

The EU Digital Services Act (DSA)[25] , which came into effect in February 2024, is a landmark set of regulations that introduces new transparency and accountability requirements for VLOPs. The DSA provides users with additional rights to challenge discriminatory moderation practices by requiring platforms to explain decisions for blocking accounts, removing content, or demoting posts. It also allows users to pursue out-of-court settlements for redress.[26]

Findings from our focus groups indicate that awareness of the DSA and its provisions is extremely low among sex workers, with only one participant out of twenty aware of its existence. When the DSA was explained, many participants felt that the law would not realistically empower them to use its redress mechanisms. For many workers, the idea of interacting with any government-related process was met with distrust:

> "Any governmental act makes me so afraid. I would need some local organisation who knows the ins and outs."
>
> **- Parker, Germany**

> "I didn't hear about it until now from you, so that's sad. From what I've seen from going on the web just now, it's a lot of text and nothing proving that it's working or doing something. So my feeling is that I can't trust it, that it's just using some public money, saying that they are doing something."
>
> **- Alex, Romania**

[25] European Commission https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package See Hacking Hustling 2020; and Blunt in Blunt et al., 2021.

[26] Algorithm Watch https://algorithmwatch.org/en/dsa-explained/

A significant barrier to sex workers using the DSA was concern around required identification. This could expose them as sex workers, potentially leading to discrimination and privacy risks:

> "I don't know if this would work for everyone. I wouldn't want to share my personal identifying information."
>
> - Lily, Germany

Participants emphasised the need for support from third-party organisations, such as sex worker rights groups or legal advisory groups, which could serve as intermediaries between them and governmental processes. Participants highlighted the necessity of anonymity, practical information, and guidance on the risks and benefits of taking action under the DSA. Femme noted:

> "I definitely agree that there would need to be a third party in between (me and the DSA), where I could somehow remain anonymous. That would be specifically, in my opinion, a sex worker-based organisation that acts as a liaison between the person who has experienced this and then the government."
>
> - Femme, Austria

Miquel from focus group one also highlighted the need for access to free legal support and clear guidance to understand the potential outcomes of taking legal action under the DSA:

> "One of the things I would need in order to take action would be proper legal advice: free legal services to properly assess the risks involved in taking full legal action; knowing that an infraction against my rights has been committed by this social media provider; knowing if I'm going to be compensated for those violations made, and generally understanding the consequences of the legal process. Would then the social media provider write me an apology or seek redress? I would just love to have proper legal advice to properly assess the risks of going ahead with such claims."
>
> - Miquel, Spain

Other participants noted the need for expectation management, as long legal cases against platforms can be financially and emotionally exhausting. Anna suggested that third parties should set clear timelines and goals to make the process more accessible and less intimidating:

> "We might need a timeline for pursuing a legal case against social media companies, a long case can be mentally draining."
>
> - Anna, Ireland

The DSA relies on national laws to define what counts as "illegal content", which creates inconsistencies, as the legality of sex work varies across the EU (Tiidenberg, 2021). Participants raised concerns that abolitionist policies in certain EU countries could make it harder for them to access protections under the DSA. Rosario noted:

> "For example, living in France, I feel like the whole system is really abolitionist of sex work, so I don't know if it will really have an impact on social media, knowing that the state organism doesn't want us to do sex work at all."
>
> - Rosario, France

Rachel Griffin's current research examines the DSA in detail. Griffin supports the recommendation to involve third-party organisations in improving accessibility to the DSA's redress mechanisms:

> "Something that might make a big difference in terms of accessibility would be having some kind of institutional support or an organisation that knows the process that can help people through it. Money shouldn't be an issue. It would be more about digital literacy and just having the time and the information that you need."
>
> - Rachel Griffin

One important part of the DSA (section five) requires VLOPs to assess, document, and mitigate "systemic risks",[27] which include risks that specifically impact marginalised groups. In particular, the DSA emphasises that platforms must consult with affected communities, conduct independent audits, and create anti-discrimination protocols to protect user rights, including those of sex workers. This gives civil society organisations a chance to demand more inclusive policy implementation and greater accountability from platforms on behalf of vulnerable communities.

However, Rachel Griffin points out that while the 'systematic risks' are defined, how VLOPs then assess the presence of them is not clearly defined:

> "It's not in business interest to just completely overhaul operations, when they could just define a risk a little bit differently, so that it doesn't really require them to make any big changes. But at the same time, they are meant to consult with civil society organisations, I think there's scope for a lot of input - making sure that their risk assessments are adequate and are covering the important areas."
>
> **- Rachel Griffin**

Griffin's suggestion to encourage civil society organisations to prioritise non-discrimination aligns with the DSA's calls for independent audits and transparency. These audits allow for regular review of platform policies. The DSA also requires mandates to look at how automated content moderation may unfairly impact marginalised users through excessive content removal. Digital rights groups can press platforms to conduct these audits, share the findings, and improve communication around content moderation policies to prevent biased enforcement.

[27] The EU digital Services Act https://www.eu-digital-services-act.com/Digital_Services_Act_Articles.html

Summary of Recommendations:

- **Incentivise Third-Party Support:** *National governments and EU bodies should establish and fund partnerships with sex worker rights and digital rights organisations to support marginalised communities navigating DSA mechanisms. Providing funding for these organisations to offer free legal assistance, anonymity guarantees, and case management would ensure sex workers feel safe enough to engage with the DSA.*
- **Enable Anonymous or Pseudonymous Redress:** *The DSA should permit redress processes that protect the identities of users. This is essentially in order to tackle the discrimination faced by the most marginalised members within the sex work community including migrants, LGBTI+, and racialised sex workers. Allowing pseudonymous submissions would encourage more sex workers to access the law's protections without fear of exposure.*
- **Establish Local Legal Aid Frameworks:** *In recognition of legal disparities across EU member states, policymakers should provide country-specific resources on DSA protections, particularly in countries where sex work remains criminalised. This approach would address the variability in sex work legality that affects how effectively the DSA can protect sex workers across different jurisdictions.*
- **Develop Precise Risk Assessment Criteria:** *Policymakers should work closely with groups focused on platform-related risks to sex workers to develop and refine specific risk criteria. This will help ensure that VLOPs accurately identify and prioritise risks impacting over-censored users, like sex workers, rather than opting for generalisations that dilute the DSA's intent.*
- **Digital and Civil Rights Groups:** *Leverage the DSA's mandates on anti-discrimination and accountability to hold platforms responsible for the equitable treatment of marginalised communities, including sex workers.*

Chapter Three: Findings and Recommendations for Cultural and Civic Entities

The following recommendations are directed at civic and cultural entities. This encompasses a broad range of groups from local, grassroots sex worker rights organisations to those in the fields of human rights, digital rights, and accountability:

1. Peer-to-Peer Digital Literacy and Worker-Led Visibility Initiatives
2. Digital Rights Organisations Involvement
3. Education and Myth-Busting Harmful Narratives

1. PEER-TO-PEER DIGITAL LITERACY AND WORKER-LED VISIBILITY INITIATIVES

As seen in Chapter One, focus group participants frequently mentioned avoiding reporting abuse or discrimination on social media, often feeling that existing systems are biased against them. Peer-to-peer networks play a crucial role in building trust between sex workers and the accountability mechanisms offered by digital rights legislation, such as the DSA.

Peer-led organisations should create accessible, user-friendly guides on platform policies, moderation rules, and redress options specifically for sex workers. Dr. Carolina Are's Instagram posts through her account @Bloggeronpole are an excellent example, providing clear information on Meta's 2021 Sexual Solicitation policy for the pole dancing and sex work communities: [28]

[28] Meta https://transparency.meta.com/en-gb/policies/community-standards/sexual-solicitation/

HOW DOES IG'S SEXUAL SOLICITATION POLICY WORK?
TO GET DONE FOR SOLICITING, ACCOUNTS' CONTENT HAS TO MEET 2 CRITERIA
1) OFFERING OR ASKING FOR SEXUAL SOLICITATION - THIS IS EXPLICIT OR IMPLICIT (E.G. THROUGH PROVIDING A METHOD OF CONTACT)
2) POSTING "SUGGESTIVE ELEMENTS"
@BLOGGERONPOLE
bloggeronpole • Follow
bloggeronpole So following a set of account deletions in my network, I spoke with IG again to ask for clarification about what happened. The news is not good: most deletions were deemed appropriate for breaching of their Sexual Solicitation policy. In this slideshow, I hope to provide some info on things to avoid to keep yourself safe - some of these are already obvious to some, but worth reiterating for how simultaneously strict and broad they are. Meanwhile, please keep signing the change.org petition from December (in my bio & stories). It's currently at 117K signatures and if it gets to 150K it'll be one of change.org's most signed petitions - sending an important message on what we all think of IG's puritan
Liked by jasonwimberly and others
July 11, 2021
Log in to like or comment.

fig.1 Instagram post from Dr Carolina Are @bloggeronpole (2021, July 11th) detailing Meta's sexual solicitation policy and how it is relevant to sexualised content creators [Instagram post].

These posts helped sex workers stay informed about policy changes and potential risks, enabling them to take informed steps to protect their accounts and content. Similarly, ESWA's 2023 Sex Work and Tech Tarot Cards - a creative, community-focused resource - equips sex workers with practical knowledge on digital rights and online discrimination. [29] These examples show how tailored resources can empower sex workers and increase their awareness, helping them to better navigate digital spaces.

Peer organisations also have a vital role to play in advocating for stronger privacy protections, such as anonymous reporting options or pseudonym-friendly policies on major platforms, as discussed in Chapter One. Tools such as anonymous support groups and pseudonym-friendly spaces provide sex workers with safer ways to navigate online spaces without compromising their safety.

Finally, compiling case studies of reporting outcomes, both positive and negative, can help peer organisations to track trends in platform accountability. By documenting the experiences of sex workers who engage with reporting processes, peer organisations can identify common issues and advocate for more effective moderation practices. Sharing these outcomes publicly can empower other sex workers by showing that change is possible and highlighting the persistence of discriminatory practices where they still exist.

[29] https://www.eswalliance.org/tarot_cards

Summary of Recommendations:

- **Visibility Campaigns:** *Foster and support visibility campaigns that do not endanger sex workers through deplatforming or unwanted exposure.*
- **Support Programmes for Platform Navigation:** *Establish support programmes to help sex workers navigate complex reporting systems; offer step-by-step guidance on documenting incidents, preparing evidence, and submitting reports effectively. Create accessible, user-friendly guides on platform policies, moderation rules, and redress options specifically for sex workers.*
- **Tracking and Analysis of Reporting Outcomes:** *Compile case studies of reporting outcomes, whether positive or negative, in order to track patterns in platform accountability.*
- **DSA Third Party Support:** *Be prepared to walk sex workers through knowing and practising their user rights afforded by the DSA.*

2. DIGITAL RIGHTS ORGANISATIONS INVOLVEMENT

Our interviews highlighted a crucial recommendation: digital rights organisations must strengthen their connections with local sex worker rights groups, especially those founded and led by sex workers. Jillian York emphasises that effective participation in platform accountability discussions largely depends on an organisation's network within the digital rights landscape, which has traditionally lacked sex worker representation:

> "There's not necessarily going to be a local digital rights group that you can link up with, and maybe even if there were, they wouldn't share your goals. And so that's where I think it breaks down."
>
> **- Jullian York**

Digital rights organisations must educate themselves on the specific set of accountability issues that sex workers are facing online. Lola Hunt noted for example that human and digital rights groups must understand and counter harmful narratives around sex work and trafficking to avoid inadvertently supporting discriminatory policies:

> "Assembly Four, as a lot of the peer orgs are doing, are focused on this right now: we're combating the porn panic and right-wing narratives attached to this. But if you look at a lot of other left wing organisations that aren't directly involved with sex workers or don't have sex workers involved with them that they know of, they aren't getting it right...They are making it actively harder for workers to exist."
>
> **- Lola Hunt**

Digital rights organisations must take advantage of new anti-discrimination provisions and increased regulatory pressures on platforms to be transparent and conduct risk-assessments under new accountability legislation such as the Digital Services Act, as outlined in Chapter Two. Digital rights organisations must engage in these processes, using their networks and resources to bring sex worker-led organisations along with them.

As well as focusing on anti-discrimination issues in relation to sex work, it was highlighted during interviews that digital and human rights advocacy groups need to collaborate internationally:

> "We really need to be paying attention to what is happening in other countries because that is going to be exported to you if you are in a Five Eyes (FVEY)[30] country. We need to look around us and not just be paying attention to what is happening in our own country."
>
> **- Lola Hunt**

Finally, through partnerships with sex worker rights organisations, digital rights groups can strengthen sex workers' capacity to defend their rights and build sustainable peer-to-peer support networks. Dr. Stardust stressed the importance of this grassroots empowerment approach alongside high-level policy efforts:

[30] The Five Eyes Alliance is a global intelligence network between the US, UK, Australia, New Zealand and Canada. Forbes, 2024 https://www.forbes.com/advisor/business/what-is-five-eyes/ [Accessed 01.11.2024].

"We often think about strategy in terms of a top down approach: how do we change the laws that affect the people? But we also need to think about how we resource communities and mobilise communities to act on their rights. Accountability relies on information and awareness, access to justice, access to community organisations, and having referral networks. I think a key strategy is movement building, along with campaigning and policy advocacy."

- Dr. Zahra Stardust
Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee

Summary of Recommendations:

- **Strengthen Connections with Sex Worker Groups:** *Prioritise partnerships with sex worker-led organisations to understand their specific digital accountability needs.*
- **Leverage Regulatory Advances:** *Utilise anti-discrimination provisions under the DSA to demand platform transparency, conducting joint risk assessments with sex workers.*
- **Privacy-Respecting Verification:** *Advocate for privacy-respecting verification alternatives, such as user-tagging and pseudonymous validation, over invasive surveillance.*

3. ADDRESSING SURVEILLANCE-CREEP

"There's this massive redirection of public resources towards surveillance instead of towards education and literacy."

- Dr. Zahra Stardust
Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee

Finally, to improve platform accountability towards sex workers, civic and cultural entities must actively work to dismantle "surveillance creep", specifically the growing use of child safety measures to justify the encroachment of discriminatory censorship practices on platforms.

In one-to-one interviews, participants expressed concern about the widespread use of surveillance technologies, such as age verification through ID submission or biometric facial age estimation. Interviewees highlighted that these methods not only raise privacy and discrimination issues, but also further marginalise users by enforcing invasive procedures that compromise personal security and reinforce stigmatising scrutiny.

The founders of Assembly Four spoke extensively about the need to address rising surveillance and how this intersects with sex work:

> "I think surveillance creep is a big problem for us. Digital identity, privacy rights, this is how so much sneaks through: we've got our eyes on trying to survive, and then we have bills that are proposing that in order to use online services, you have to have a digital ID, and those bills impact our ability to live."
>
> **- Eliza Sorensen**
> *Founder of sex worker technologist collective Assembly Four*

Dr Stardust discussed the findings of her recent study into biometric facial recognition software and how the increasing adoption of these programmes, often under the guise of child-protection, leads to discrimination particularly against socially marginalised users:

> "We did some research into age verification, we looked at age estimation software that used people's faces to estimate their age and we found that it misclassified boys more than girls. It worked best on white faces and worst on dark faces. It made errors of up to 40 years in estimating people's age."
>
> **- Dr. Zahra Stardust**
> *Co-Vice Chair of the World Association for Sexual Health's Sexual Rights Committee*

Effective advocacy should focus on developing alternatives to invasive surveillance. This could involve privacy-respecting verification methods, such as user-centred tagging and pseudonymous validation. In our last focus group, Casper highlighted the challenges of current verification methods, describing how they often require users to share both personal and work details, creating barriers and compromising privacy. Casper suggested alternatives:

> "I don't think people should ever have to use their legal details as well as their work details, for example. But maybe there's a way of verifying something from a work persona in an anonymous way: whether it's having a hidden word on your website for that one day when the person checks it, so it proves that you're the one running that website, something like that."
>
> **- Casper, Netherlands**

Civil society and digital rights organisations are also encouraged to advocate for balanced online safety frameworks that prioritise freedom of expression and dignity for all digital citizens, including marginalised groups such as sex workers. As Griffin adds:

> "There's been more and more focus in the last couple of years on child safety. That's a really important risk area. If I were a civil society organisation in this space, I would be thinking: how can you put as much emphasis as possible on yes, child safety is an important risk, but if you prioritise child safety so much that you're taking down loads of content, that also poses a lot of risk to other things that are also protected by the DSA, such as freedom of expression."
>
> **- Rachel Griffin**

Summary of Recommendations:

- Digital and Sexual Education Advocacy: *Promote improved sex education and digital literacy in place of heightened age-verification measures.*
- Balanced Online Safety Frameworks: *Advocate for balanced online safety frameworks that prioritise freedom of expression and dignity for all digital citizens, including marginalised groups such as sex workers.*

Conclusion

This community report highlights two key reflections. Firstly, there remains a persistent disconnect between the needs of sex workers and some of the suggested measures to improve platform accountability. Researchers, technologists, and advocacy groups must work together to close this gap by prioritising solutions that are both accessible and practical for the communities they aim to support. As conversations around deplatforming become more mainstream, it's crucial to centre the voices of sex workers. If we had listened more closely to sex workers, perhaps outcomes such as the TikTok ban and reinstatement might have been less surprising.[31] Sex workers have long warned of the dangers of overnight deplatforming, the immediate loss of workplace and livelihoods without an appeal process.

Secondly, every recommendation in this report comes with an essential caveat: no single measure can solve the complex challenges of platform accountability. Despite this, techno-solutionism continues to dominate the conversation, often undermining the effectiveness of proposed strategies. From anti-bias training to improved algorithms, each approach must be integrated into a broader framework that acknowledges the technical, political, legal, and social dimensions of the issue. Only by addressing these complexities collectively can we achieve meaningful accountability.

[31] Dr Carolina Are @bloggeronpole (2025, January 18th) "my hot take on the potential TikTok ban is that 1) decision over safety are always political & 2) many content creators are gonna be experiencing what [sex workers] experience on platforms on the daily, aka overnight deplatforming" [Instagram post] [Accessed 19.01.2025].

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